

**REMARKS**

These Remarks are in response to the Office Action mailed on November 16, 2006. Claims 1-21 are pending. The Office Action objected to the Specification and claims 1, 20, and 21. Claims 1-21 were rejected. Claims 1 and 20 have been amended, new claims 22-54 added, and method claim 21 has been cancelled in favor of the newly added method claims 32-54. These are all discussed below under the corresponding heading.

**Specification**

The disclosure is objected to because it contains embedded hyperlinks and/or other forms of browser-executable code. The have been replaced by just the name of the corresponding web page.

**Claim Objections**

Claims 1 and 20 are objected to because of informalities. Appropriate correction has been made.

**Claim Rejections Under 35 U.S.C. §102 and §103**

Independent claims 1 and 20 are rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 7,031,903 B2 to Debling ("Debling"), with dependent claims 2-19 also rejected either under 35 U.S.C. §102(e) based on Debling or under 35 U.S.C. §103(a) with Debling as the primary reference.

Independent claims 1 and 20 are respectively drawn to device and corresponding system that can store and serve web content from its non-volatile memory to a digital appliance. This is something that is neither taught nor suggested by Debling, which is rather, as described there in the "Filed of the Invention" (column 1, lines 5-8), a communication device suitable for debugging ...".

More specifically, as noted in the Office Action, Debling does disclose an "on chip memory 721" at column 5, line 25, where, as described further at column 5, lines 31-32, "[t]he on-chip memory circuitry 721 may comprise flash memory"; however, this is the entirety of the

Debling's disclosure concerning non-volatile memory on the "communication device 700". Neither in this memory nor elsewhere on the device 700 does disclose storing "web content".

As also noted in the Office Action, at column 5, lines 41-42, Debling does state that "[i]n use the on-chip processing circuitry 720 operates using embedded web server processes"; but this does not describe the preparing of web content stored on the device 700 itself so that it may be server to Debling's "host computer 800". Rather, the "communication device 700" of Debling, as described in the rest of this paragraph in Debling, and these "embedded web server processes" are for the processing of data that is just passing through device 700 from an another device on its way to or from the "host computer" 800. For example, as it continues at line 43:

The consequence is that it is possible to move certain selected processes *from the host* onto the on-chip processing circuitry 720. Typically processes suitable for implementation on the on-chip processing circuitry include those that need frequent interaction with the target [target chip 100]. Examples of these are filtering debug events  
...

where the emphasis has been added. Note that it is processes "from the host", which would not rather than processes that a server would perform, that are transferred onto the device 700 and that is for interactions with "target chip 100". Debling also discusses this further in the paragraph at lines 33-40 of column 5. As is believed clear from Debling's discussion, this is all data passing through the device 701. It is *not about data stored on the device*.

In contrast, the invention being claimed in claims 1 and 20 s for a device that can store and provide web content to a digital appliance, something which is not found Debling. Debling neither teaches nor suggests the serving, to a digital of appliance, of web content *from a non-volatile memory of the device itself*.

More specifically, claim 1 reads:

1. A web server emulation device for serving web content, the web server emulation device adapted to be coupled to a digital appliance for end use of at least part of the web content, the web server emulation device comprising:
  - one or more non-volatile storages *for storing at least part of the web content*;
  - one or more interfaces, coupled to at least one of the nonvolatile storages, the one or more interfaces for receiving and sending at least part of the web content, and
  - one or more agents *for preparing web content to be served* the digital appliance,
  - wherein at least part of *the web content is served to the digital appliance* for end use of the web content.

The emphasis has been added to highlight the distinctions from Debling that were discussed above.

With respect to the “more non-volatile storages for storing at least part of the web content”, the Office Action cites the “on-chip memory circuitry 721” of Debling; however, neither in this memory nor elsewhere does Debling disclose the storing of web content on the device 700.

With respect to the “agents for preparing web content to be served the digital appliance”, the Office Action cites Debling at column 5, lines 41-43; however, this just discloses the “on-chip processing circuitry 720 operates using embedded web server processes”, but this is for the use on data that does not originating

Finally, Debling neither teaches nor suggests that “at least part of the web content”, which is stored in the “non-volatile storages”, being “served to the digital appliance”.

Concerning claim 20, this is an independent system claim that again includes the limitations of claim 1. Consequently, the arguments given above with respect to claim 1 correspondingly apply to claim 20

Therefore, for at least these reasons, it is respectfully submitted that a rejection of independent claims 1 and 20, along with dependent claims 2-19, under 35 U.S.C. §102(e) as being anticipated by Debling is in error and should be withdrawn.

Although many of these dependent claims are believed further allowable for the various further limitations that they recite, at this time only claim 17 will be explicitly discussed. Claim 17 includes the further limitation of

[t]he one or more non volatile storages of claim 1, further comprising a hidden-from-user storage area used to store at least part of the web content, wherein said one or more agents control access to the hidden-from-user storage area.

For this limitation, the Office Action cites the Background section of the application as stating at page 6, lines 9-11, that “In a true online client/server scenario, part of the data and programs on the server are not accessible by the client”, which is an accurate quotation; however, this is not the same thing as what claim 17 recites. Rather, claim 17 recites that non-volatile storage of *a web server emulation device* includes a *hidden area* used to store web content and, further, that one or more of the “agents” control access to this hidden area. These element are not part of the “Applicants’ admission”; nor, it is believed, are they found in the prior art. Further, Debling

neither teaches nor suggests a hidden area to the non-volatile memory; and, as already discussed, Debling has no disclosure of storing web content on its element 701, whether "memory circuitry" 721 or elsewhere. Consequently, claim 17 is believed further allowable on this basis.

### New Claims

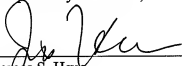
New claims 22-54 have been added. System claims 22-29 are drawn to detail of the digital appliance which forms part of the system of claim 20. Claims 30 and 31 are drawn to examples of the web server emulation device of claim 1. Method claims 32-54 are method claims drawn to Figure 3-6.

### Conclusion

Accordingly, it is believed that this application is now in condition for allowance and an early indication of its allowance is solicited. However, if the Examiner has any further matters that need to be resolved, a telephone call to the undersigned at 415-318-1163 would be appreciated.

FILED VIA EFS

Respectfully submitted,

  
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3/16/07  
Date

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